

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 20-_____
v.	:	DATE FILED: _____, 2020
ANDRE MICHAEL FELTS,	:	VIOLATIONS:
a/k/a "Dre,"	:	18 U.S.C. § 1594(c) (conspiracy to
a/k/a "Plug,"	:	engage in sex trafficking of minors
KEVIN MICHAEL FRANCIS,	:	- 1 count)
a/k/a "Kev,"	:	18 U.S.C. § 1591(a)(1), (b)(2), (c)
RYAN KEEL	:	(sex trafficking of minors
	:	- 4 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, defendant ANDRE MICHAEL FELTS, a/k/a "Dre," a/k/a "Plug," was the leader of a prostitution ring that operated in and around Philadelphia, Pennsylvania, the purpose of which was to obtain money and other items of value for the members of the ring.
2. As part of the prostitution ring, defendants ANDRE FELTS, a/k/a "Dre," a/k/a "Plug," KEVIN MICHAEL FRANCIS, a/k/a "Kev," and RYAN KEEL, and other individuals known and unknown to the Grand Jury, recruited and enticed young females, including minors, to engage in commercial sex acts, harbored and maintained the females at various residences for that purpose, and transported and provided the females to males who purchased the commercial sex acts.

3. As part of the prostitution ring, defendant ANDRE FELTS, a/k/a “Dre,” a/k/a “Plug,” and other individuals known and unknown to the Grand Jury utilized the Internet website www. Backpage.com, on which defendant FELTS and others known and unknown to the Grand Jury advertised various females, including minors, as available for commercial sex acts.

4. Defendants ANDRE FELTS, a/k/a “Dre,” a/k/a “Plug,” KEVIN FRANCIS, a/k/a “Kev,” and RYAN KEEL collected a portion of the proceeds from the minors’ commercial sex acts.

5. From on or about February 1, 2016, through on or about February 1, 2017, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANDRE MICHAEL FELTS,
a/k/a “Dre,”
a/k/a “Plug,”
KEVIN MICHAEL FRANCIS,
a/k/a “Kev,” and
RYAN KEEL**

conspired and agreed with each other, and with other persons known and unknown to the Grand Jury, in and affecting interstate and foreign commerce, to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain at least one person, including but not limited to Minor 1, Minor 2, Minor 3, and Minor 4, each of whose identities are known to the Grand Jury, knowing and in reckless disregard of the fact that such person had not attained the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe such person, in violation of Title 18, United States Code, Section 1591(a)(1), (b)(2), and (c).

All in violation of Title 18, United States Code, Section 1594(c).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about September 1, 2016, and on or about January 1, 2017, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANDRE MICHAEL FELTS,
a/k/a “Dre,”
a/k/a “Plug,” and
KEVIN MICHAEL FRANCIS,
a/k/a “Kev,”**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Minor 1, and aided and abetted the same, knowing and in reckless disregard of the fact that Minor 1 was under the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe Minor 1.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c), and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 1, 2016, and on or about January 19, 2017, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANDRE MICHAEL FELTS,
a/k/a “Dre,”
a/k/a “Plug,” and
KEVIN MICHAEL FRANCIS,
a/k/a “Kev,”**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Minor 2, and aided and abetted the same, knowing and in reckless disregard of the fact that Minor 2 was under the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe Minor 2.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c), and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 1, 2016, and on or about February 1, 2017, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANDRE MICHAEL FELTS,
a/k/a “Dre,”
a/k/a “Plug,” and
KEVIN MICHAEL FRANCIS,
a/k/a “Kev,”**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Minor 3, and aided and abetted the same, knowing and in reckless disregard of the fact that Minor 3 was under the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe Minor 3.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c), and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 1, 2016, and on or about February 1, 2017, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANDRE MICHAEL FELTS,
a/k/a “Dre,”
a/k/a “Plug,” and
KEVIN MICHAEL FRANCIS,
a/k/a “Kev,”**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Minor 4, and aided and abetted the same, knowing and in reckless disregard of the fact that Minor 4 was under the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe Minor 4.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c), and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1591(a)(1), (b)(2), (c), and 1594(c) set forth in this Indictment, defendants

**ANDRE MICHAEL FELTS,
a/k/a “Dre,”
a/k/a “Plug,”
KEVIN MICHAEL FRANCIS,
a/k/a “Kev,” and
RYAN KEEL**

shall forfeit to the United States of America:

(a) any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of such violations, and any property traceable to such property; and

(b) any property, real or personal, constituting or derived from any proceeds traceable to such violations.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

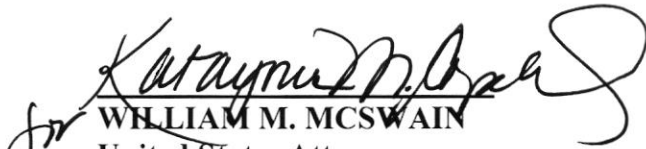
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Sections 1594(d) and (e).

A TRUE BILL.

FOREPERSON


WILLIAM M. MCSWAIN
United States Attorney

No. 20-_____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

ANDRE MICHAEL FELTS, et al

INDICTMENT

Counts

18 U.S.C. § 1594(c) (conspiracy to engage in sex trafficking of minors – 1 count)
18 U.S.C. § 1591(a)(1), (b)(2), (c) 18 U.S.C. § 1591(a)(1), (b)(2), (c) (sex trafficking of minors – 4 counts); 18
U.S.C. § 2 (aiding and abetting); Notice of Forfeiture



Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____
